

EXHIBIT B



March 31, 2016

Via Electronic Mail

Baine P. Kerr
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California Department of Justice
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Re: Plaintiffs' Comments on DOGGR's Draft Administrative Record Index

Dear Baine:

Thank you for providing Plaintiffs' counsel with a copy of DOGGR's March 22, 2016 draft administrative record index in *Center for Biological Diversity et al. v. DOGGR*, Case No. RG15769302. We appreciate the opportunity to submit informal feedback on the draft.

As a preliminary matter, we are necessarily limited in our ability to review and substantively comment on the draft index because of our lack of access to the majority of the underlying documents listed therein. The index's brief document descriptions do not adequately convey the nature and contents of the documents, and no links are provided in the index to the documents themselves, or to the documents' sources. Thus, we cannot effectively assess the appropriateness of index's contents, especially with respect to the documents listed on pages 7 through 92 of the index (i.e., the non-rulemaking file documents). Nor can we conclusively determine whether documents that must be included in the record are, in fact, listed in the index.

Notwithstanding these constraints on our review, we do have the following comments, and hope to discuss these issues with you further before the record is certified on April 22, 2016.

1. Certain documents appear to be missing from the draft index.

In an effort to facilitate the prompt certification of an administrative record and minimize disputes over its contents, Plaintiffs provided you with a thumb drive on December 9, 2015 containing an initial submittal of documents related to the UIC program for inclusion in the record. The draft index does not appear to include all of these documents.

For example, we cannot find any index listings for:

- DOGGR report titled "Benzene in Water Produced from Kern County Oil Fields Containing Fresh Water" (1993). This document was cited in the Center for Biological Diversity's April 14, 2015 Comment Letter on DOGGR's emergency regulations and is properly part of the

record. All documents attached to or included in the Center's comment letter, including hyperlinks within the comment letter, must be included in this action's record.

- Well files for wells #03046344; 03048005; 03049265; 03051199; 03054678; 3055307;
- Emergency Orders to Immediately Cease Injection Operations dated 2014 and 2015;
- Technical Reports and Groundwater Sampling Reports (e.g., Redbank Oil Company, Technical Report, Injection Fluid Analysis; Mcpherson Operating Company Formation Water Sampling Report; and others provided in Plaintiffs' December 9 submission); and
- Monitoring Programs for Waste Disposal Wells (e.g., Monitoring Program for Water Disposal Well Pulas 6 Arroyo Grande Field).

Other documents submitted by Plaintiffs to DOGGR for inclusion in the record may also be missing from the draft index. DOGGR appears to have re-titled or given new titles to the documents in its draft index, which makes it impossible to ascertain what additional documents from Plaintiffs' submission are missing from the draft index.

We would appreciate clarification from DOGGR regarding whether the agency reviewed Plaintiffs' December 9, 2015 submission of documents in assembling its draft index, and whether the agency made deliberate decisions to exclude certain submitted documents from the draft index. If DOGGR has a list of documents that it rejected, please provide us with that list so that we may efficiently work toward resolving remaining disputes over the scope of the record. Attached hereto for your reference is the index that accompanied our December 9, 2015 submission of documents for inclusion in the record.

2. The scope of listed well files and basis for these files' inclusion is unclear.

Plaintiffs are unclear about the scope of well files included in the draft index, and whether DOGGR chose to include certain well files and exclude others. The section of the current draft index titled "Project Files and Well Files" (pp. 7-14) appears to include a few dozen project or well files only.

Plaintiffs' petition for writ of mandate implicates all Class II UIC injection wells operating into non-exempt aquifers or aquifers with uncertain exemption status (i.e., the eleven aquifers "historically treated as exempt"). At the time Plaintiffs filed their petition, DOGGR had admitted that the number of such wells exceeded 2,500 in number. DOGGR has since admitted that thousands of additional wells are operating without permits into non-exempt aquifers.

Plaintiffs thus request confirmation that DOGGR is including in its draft index the complete files for each Class II UIC well authorized to operate, or currently operating, into a non-exempt aquifer or one of the eleven aquifers "historically treated as exempt." If the draft index does not contain complete well files, or contains files for only a subset of the total wells authorized to operate into non-exempt aquifers, Plaintiffs seek an explanation regarding DOGGR's basis for including certain well files in the draft index and excluding others.

3. *The scope of listed map files and basis for including these files is unclear.*

Similar clarification is needed by Plaintiffs with respect to the draft index section titled “Maps and Cross-Sections” (pp.15-46). This section lists a large number of maps, but the relevance and utility of these files is unclear from their titles and descriptions.

Plaintiffs thus would appreciate confirmation that DOGGR has included in its draft index all maps relevant to all of the Class II UIC wells authorized to operate, or currently operating, into a non-exempt aquifer or one of the eleven aquifers “historically treated as exempt.” If the draft index does not contain complete map files, or contains map files relating only to a subset of the wells at issue in this action, Plaintiffs request an explanation from DOGGR for its decision to include certain map files and exclude others.

Plaintiffs hope to work with DOGGR to resolve record-related issues before the record’s certification on April 22, 2016. To this end, we would appreciate scheduling a phone call with you to discuss the issues outlined in this letter. In submitting these comments, Plaintiffs do not waive their rights to raise record objections or seek supplementation of the record at a later date.

Thank you for your time and attention to this matter.

Best regards,



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Counsel for Plaintiff Center for Biological Diversity

Enclosed: Index of Documents Submitted by Plaintiffs to DOGGR for Inclusion in Record
(December 9, 2015)

INDEX

PLAINTIFFS' INITIAL SUBMITTAL OF UIC PROGRAM RELATED DOCUMENTS FOR EVIDENTIARY NEGOTIATION/STIPULATION

I. Documents on Agency Websites

DOC TITLE	DATE	FILE NAME	NOTES
Submittal of Review Information for Category 2 Wells	7/31/15	20150731 Joint Letter to US EPA (Montgomery) re Cat 2 wells	From DOGGR website
Letter from DOGGR to EPA re Cat. 1 Well Review Findings	10/15/15	20151015 - Joint Letter to US EPA Cat 1 Well Review Findings	From DOGGR website
Joint Letter to US EPA Cat 2 Well Review Findings	10/15/15	20151015 - Joint Letter to US EPA Cat 2 Well Review Findings	From DOGGR website
Aquifer Exemption Guidance Document	4/10/15	Aquifer Exemption Guidance Document 4-10-2015	From DOGGR website
Letter from EPA to DOGGR re Class II UIC Program	12/22/14	CA Class II UIC letter December 22 2014.docx	From DOGGR website
Attachment1 to EPA Letter (2021 Wells Associated w Project)	7/31/15	Copy of 20150731 EPA Letter, Attachment 1, 2021 Wells Assocd w Proj	From DOGGR website
Attachment 2 to EPA Letter (3604 Wells Not Associated d w Project)	7/31/15	Copy of 20150731 EPA Letter, Attachment 2, 3604 Wells Not Assocd w Proj	From DOGGR website
Letter from EPA to Bishop and Bohlen	5/28/15	EPA-UICltr5-28-15	From DOGGR website
Letter from DOGGR to EPA 2/6/15 FINAL	2/6/15	Dual Letterhead_US EPA Letter	From DOGGR website
Letter from DOGGR to EPA 7/15/15	7/15/15	July 15 2015 US EPA Deliverable From	DOGGR website
Letter from EPA to DOGGR 3/9/15 UIC	3/9/15	- SDWA Compliance Ltr 3-9-15 From	DOGGR website
Letter from DOGGR to EPA 5/15/15	5/15/15	US EPA 5-15-2015 Update	From DOGGR website
Letter from EPA to DOGGR transmitting EPA Final Report	7/18/11	USEPA_July18_2011_Letter	From DOGGR website

DOC TITLE	DATE	FILE NAME	NOTES
California Class II UIC Program Review (EPA)	6/11	fullreport	From DOGGR website
Excel Spreadsheet Listing Permitted Wells, sent to EPA	Undated	Copy of List of Permitted Wells Sent to EPA.xlsx	From DOGGR website
California DOGGR Application for Primacy in Regulation of Class II UIC Wells under Section 1425 of SDWA	4/81	Application for Primacy	From DOGGR website
Letter from EPA to DOGGR 12/85	Aquifer_Exemption_McCool_Ranch_Oil_Monterey_D_Sands		From DOGGR website
Cal EPA Review of UIC Program	3/2/15	2015-03-02 Memo re UIC Findings From Department of Conservation website	
EPA Letter to DOGGR – Aquifer Exemption Application – Portion of Upper Tulare Formation	8/4/09	ASPHALTO Upper Tulare AQUIFER EXEMPTION	From DOGGR website
EPA Letter to DOGGR – Aquifer Exemption Application, Monterey County	7/12/09	MONTEREY_CO_AERA_AQUIFER_EXEMPTION	From DOGGR website
Letter Regarding MOA on Primacy and Exempted Aquifers (with MOAs attached)	2/6/15	MOA_EPA_UIC_1982	From DOGGR website
Appendix A - Water Board Resolution 88-63	2/1/06	UIC_APP_A	From DOGGR website
Appendix B - Example Maps – Planar and Cross Section	3/29/10	UIC_APP_B1	From DOGGR website
Appendix C – Casing Diagram Information	3/4/11	UIC_APP_C	From DOGGR website
DOGGR Aquifer Exemption Application Powerpoint	3/24/15	DOC Aquifer Exemption	From DOGGR website
EPA Aquifer Exemption Powerpoint	3/24/15	EPA Aquifer Exemption	From DOGGR website
SWRCB Aquifer Exemption Request Review Process	3/24/15	SWRCB Aquifer Exemption	From DOGGR website

DOC TITLE	DATE	FILE NAME	NOTES
EPA Guidance for Review and Approval of State UIC Programs and Revisions to Approved Programs	Undated	Aquifer Exemption Guidance 34	From DOGGR website
EPA Memo - Enhancing Coordination and Communication with States on Review and Approval of Aquifer Exemption Requests under SDWA	7/21/14	EPA Aquifer Exemption Guidance and Checklist July 2014	From EPA Website
Permitting Guidance: Response to Summary Comments	2/14/14	Permitting Guidance - epa816d14001 From EPA Website	From EPA Website
Well Details: 03046344	1/13/12	03046344_.pdf	From DOGGR Well Database
Well Details: 03048005	6/6/12	03048005_.pdf	From DOGGR Well Database
Well Details: 03049265	11/30/12	03049265_.pdf	From DOGGR Well Database
Well Details: 03051199	6/6/13	03051199_.pdf	From DOGGR Well Database
Well Details: 03054678	4/16/14	03054678_.pdf	From DOGGR Well Database
Well Detail: 3055307	6/17/14	03055307_.pdf	From DOGGR Well Database
Notice of Proposed Emergency Rulemaking Action		20150330 Emergency Rulemaking Notice for Aquifer Exemption Compliance Schedule Regulations	From DOGGR website
Text of Proposed Emergency Regulation		20150330 Text of Aquifer Exemption Compliance Schedule Regulations	From DOGGR website
Emergency Rulemaking Comment Response		20150417 AE Compliance Schedule Regulations - Comment Response	From DOGGR website
Revised Finding of Emergency		20150420 Revised Finding of Emergency for Aquifer Exemption Compliance Schedule Regulations	From DOGGR website
Final Text of Emergency Regulations		20150420.3 Final Text of Aquifer Exemption Compliance Schedule Emergency Regulations	From DOGGR website

DOC TITLE	DATE	FILE NAME	NOTES
Aquifer Exemption Compliance Schedule Regulations - Initial Statement of Reasons		AECS Permanent Rulemaking - ISOR From DOGGR website	
Aquifer Exemption Compliance Schedule Regulations – Notice of Proposed Action		AECS Permanent Rulemaking - NOPA	From DOGGR website
Text of Permanent Regulations		AECS Permanent Rulemaking - Text of Regulations	From DOGGR website
Field Boundary Maps	4/1/15	DOGGR Field Boundary Specifications 1 through 9	From DOGGR website
Economic Impact Statement		Form 399	From DOGGR website
Notice of Request for Re-Adoption of Emergency Rulemaking Action		Notice Readoption Final	From DOGGR website
Notice of Approval of Emergency Rulemaking Action		OAL Approval 4-20-15	From DOGGR website
Notice of Approval of Emergency Rulemaking Extension		October 19, 2015 OAL approves extension of aquifer extension regs	From DOGGR website
Proposed Text of Permanent Regulations		Proposed Text of Regulations	From DOGGR website
Governor Brown Declares State of Emergency	1/17/14	2014-01-17 Office of Governor Edmund G. Brown Jr Proclamation	From DOGGR website
July 17 2014 Letter from EPA Blumenfeld to Secretaries Rodriguez and Laird	7/7/14	2014-07-17 EPA Ltr to Rodriguez_Laird 071714	From Department of Conservation website
DOGGR Response to EPA Review of California's UIC Program	June 2011	DOGGR response to USEPA underground injection report	From DOGGR website
DOGGR Press Release re Steps to Review UIC Program	7/18/14	DOGGR Press Release (July 18 2014) From DOGGR website	

II. Documents from Agency Record Requests

DOC TITLE	DATE	FILE NAME	NOTES
BC Labs Analysis for Aera Energy Fluid	7/9/14 Aera	Recovered Fluid Analysis Received	from DOGGR via PRA
Subject: Recap of October 24, 2011 Meeting	10/27/11	Chernow Memo 10/27/11	Received from DOGGR via PRA
Memorandum from MG Mefford to all staff re: UIC Aquifer Exemptions (multiple documents in single file). Charts containing statistics on non-hydrocarbon bearing zones	2/8/82	1982	Received from DOGGR via PRA
Memorandum from Simon Cordova to all staff re: UIC Coordination (multiple documents in single file). Charts containing statistics on non-hydrocarbon bearing zones	4/4/82 1983	April thru 19 83 May	Received from DOGGR via PRA
Memorandum from DOGGR to Bob Reid re: UIC Zone Exemption (Multiple documents in single file)	8/24/84	1984 thru 1986	Received from DOGGR via PRA
Letter from E.A. Welge to Operators re: list of required information for injection project applications	2/14/90	1990 - 2014 and misc	Received from DOGGR via PRA
Letter from DOGGR (Stettner) to Dave Mitchell re: Tulare Aquifer Exemption	03/23/94	19940323 doggr (stettner) to Bechtel re AE application.d4bp 15	Received from DOGGR via PRA
Letter from Kern County Water Agency to D.C. Lefler re: request for Tulare aquifer exemption	05/06/84	19940503 Kern C W Agency declines to rule on AE question.d4bp 15	Received from DOGGR via PRA
Untitled, Mountain View Oil Field Pool Data	Jan. 1983	00000000 list of zones and material re Mountain View field.d4bp 01a	Received from DOGGR via PRA
USEPA Final Draft of SDWA Section 1425 Guidance	4/10/81	19810410 USEPA final draft 1425 guidance.rhBB	Received from DOGGR via PRA
Untitled, Handwritten chart of zone characteristics	9/15/81	19810915 handwritten chart re zone characteristics.rh	Received from DOGGR via PRA
Untitled, Handwritten chart of zone characteristics	1982	19820000 Handwritten chart re nonHC aquifers.1982 breakouts	Received from DOGGR via PRA
Memo to MG Mefford re information on aquifers	4/29/82 1982	20429 USEPA (Na te Lau)	Received from DOGGR via PRA
Letter from DOGGR to CMO, Inc. re Etchegoin Zone Steamflood, cyclic steam project	5/18/2012	Project Approval letter	Received from DOGGR via PRA

DOC TITLE	DATE	FILE NAME	NOTES
Gray Development Section 13267 Order plus attachment	10/15/2014	Gray Development 13267 Order-Message	Received from DOGGR via PRA
Letter from Chevron to Burt Ellison (DOGGR), re Disposal Well Application, Kern River Sands	6/1/2009	Letter from Chevron to UIC BE ref Gray KR object to KR zone inj	Received from DOGGR via PRA
Amended Emergency Order to Immediately Cease Injection Operations No. 1061	8/11/2014	1061 Amended	Received from DOGGR via PRA
Email from Randy Adams to Dan Wermeil et al re FWD: UIC Projects Monitor with Attachment 2/16/2011	2/16/2011	20110216 FW: UIC Projects Monitor	Received from DOGGR via PRA
Email from Bill Penderel to Jerry Salera Kern re Front exemption expansion interest estimations	12/18/2013	20131218_Kern Front exemption expansion interest estimations	Received from DOGGR via PRA
Email from Steve Fields to Bill Pendereal re AE Issues	12/20/2013	20131220_AE Issues	Received from DOGGR via PRA
Email from Bill Penderel to Steve Fields re RE: nothe Kern Front Chanac AE application, posted	12/20/2013	20131220_Re Nothe Kern Front Chana AE application posted	Received from DOGGR via PRA
Email from Bill Penderel to Jerry Salera Kern re Kern Front AE report format anf AE Applications received with attachment	5/2/2014	20140502_Kern Front AE report format anf AE applications received	Received from DOGGR via PRA
Email from Bill Penderel to Jerry Salera Kern re Hathaway north Kern Front Davies Reality Co. 9-3, api 029-49075	7/11/2014	20140711_Hathaway north Kern Front Davies Reality Co. 9-3 api 029-49075	Received from DOGGR via PRA
Email from Dan Wermeil to Arsenio Lagunzard et al re TDS Data? - RE: Priority - FW: Well 029-49075	7/14/2014	20140714_TDS Data - RE Priority - FW Well 02949075	Received from DOGGR via PRA
Email from Rob Habel to Steve Bohlen FW: Hathaway north Kern Front WD injection well Davies Realty 9-3 completion zone, 02949075, wfp 07182014	7/18/2014	20140718_RE Hathaway north Kern Front WD injection	Received from DOGGR via PRA
Email from John Borkovich to Rob Habel et al re RE: Map for Hathaway - Water Wells w/in 1-mile; request for meeting	7/21/2014	20140721_RE: Map for Hathaway - water Wells w/in 1-mile	Received from DOGGR via PRA
Email from Steve Fields to Graham St. Michel re Hathaway attaching multiple files on Hathaway well history	8/6/2014	20140806_Hathaway	Attaching docs on the Hathaway well project including injectivity test permit, other wells in the AOR, applications, injection data to date

DOC TITLE	DATE	FILE NAME	NOTES
Memorandum from Elena Miller to DOGGR District Deputies re Underground Injection Control (UIC) Program Expectations (Revised)	11/22/2010	DOGGR_CM6040_08202014065400	Received from DOGGR via PRA
Multiple Documents in single pdf file re Macpherson Water Disposal Project	Aug. 15, 1996	48818029	Received from DOGGR via PRA
Letter from Macpherson Oil Co. to Steven Bohlen (DOGGR) Re: Olcese Water Disposal Well No. 6; Round Mountain Field, Kern County, California	9/16/2014	Letter Steven R Bohlen DOGGR 9 16 2014	Received from DOGGR via PRA
Emergency Order to Immediately Cease Injection Operations, No 1054	7/2/2014	1054 Final CMO 20140701 1455	Received from DOGGR via PRA
Amended Emergency Order to Immediately Cease Injection Operations, No 1055	7/11/2014	1055 Amendment	Received from DOGGR via PRA
Emergency Order to Immediately Cease Injection Operations, No 1055	7/2/2014	1055, original	Received from DOGGR via PRA
Emergency Order to Immediately Cease Injection Operations, No 1056	7/2/2014	1056 Final MacPherson 20140701 1453	Received from DOGGR via PRA
Amended Emergency Order to Immediately Cease Injection Operations, No 1057	7/9/2014	1057 Final AMENDED Pace Diversified 20140709 1650	Received from DOGGR via PRA
Emergency Order to Immediately Cease Injection Operations, No 1058	7/2/2014	1058 Final R&R Resources 20140701 1505	Received from DOGGR via PRA
Emergency Order to Immediately Cease Injection Operations, No 1059	7/2/2014	1059 Final Redbank Oil 20140701 1501	Received from DOGGR via PRA
Emergency Order to Immediately Cease Injection Operations, No 1060	7/2/2014	1060 Final SOC 20140701 1450	Received from DOGGR via PRA
Emergency Order to Immediately Cease Injection Operations, No 1061	8/11/2014	1061 Amended	Received from DOGGR via PRA
Emergency Order to Immediately Cease Injection Operations, No 1063	8/18/2014	1063	Received from DOGGR via PRA
Emergency Order to Immediately Cease Injection Operations, No 1064	8/18/2014	1064 Signed Order to Macpherson	Received from DOGGR via PRA
Order Pursuant to California Water Code Section 13267 to Ruben Villa, CMO Inc.	7/2/2014	CMO Inc 13267 Order	Received from DOGGR via PRA

DOC TITLE	DATE	FILE NAME	NOTES
Emergency Order to Immediately Cease Injection Operations, No 1061	7/22/2014	Hathaway order 1061 as served	Received from DOGGR via PRA
Order Pursuant to California Water Code Section 13267 to Chad Hathaway, Hathaway LLC	7/23/2014	HATHAWAY_13267_ORDER_UIC	Received from DOGGR via PRA
Pace Diversified Corporation, California DOGGR and Water Board Order 13267 Work Plan and Action Progress Report	7/28/2014	PaceWorkPlan&ActionProgressReport	Received from DOGGR via PRA
Letter from Mike Glinzak to Webb (Berry Petroleum) re Olcese Aquifer Exemption	Nov. 9, 1989	Medford Conformation of Poso Creek Olcese AE 07101989	Received from DOGGR via PRA
Letter from David Mitchell to Jim Schaefer (Schaefer Oil Co.) re UIC Primacy	4/4/1983	DM from letter to Schaefer dis non exempt aqs 48806004	Received from DOGGR via PRA
Letter from David Mitchell to Jim Schaefer (Schaefer Oil Co.) re Kelley Knapp well	3/10/1988	DM letter to Schaefer regarding idle inj well Kelly Knapp 8 03101988	Received from DOGGR via PRA
Redbank Oil Company, Technical Report, Injection Fluid Analysis	9/4/2014	REDBANK DOGGR Technical Rpt injection Fluid analytical Results	Received from DOGGR via PRA
Letter from Denny Brown (Vintage) to Steve Bohlen (DOGGR)	7/31/2014	E.O. 1060 - Vintage (SOC) Response to Section IV	Received from DOGGR via PRA
Presentation: DOGGR UIC Program, Aquifer Exemptions	3/24/15	DOC Aquifer Exemption Presentation	Received from DOGGR via PRA
Presentation: EPA Aquifer Exemptions, David Albright	3/24/15	EPA Aquifer Exemption Presentation	Received from DOGGR via PRA
Presentation: State Water Resources Control Board on Aquifer Exemption Request Review Process N/A		SWRCB Aquifer Exemption Presentation	Received from DOGGR via PRA
Amended Emergency Order to Immediately Cease Injection Operations, No 1065	3/2/15	20150302 Final C & D Order, WSI	Received from DOGGR via PRA
Amended Emergency Order to Immediately Cease Injection Operations, No 1066	3/2/15	20150302 Final Modus Order	Received from DOGGR via PRA
Memorandum from Peter Grevatt (EPA) to Water Division Directors re: Enhancing Coordination and Communication with States On Review and Approval of Aquifer Exemption Requests under SDWA	7/24/14	EPA Aquifer Exemption Guidance	Received from DOGGR via PRA
Field Demonstration of the Conventional Steam Drive Process with Ancillary Materials	9/1/82	33800003 Project Scan Folder 2 of 2	Received from DOGGR via PRA

DOC TITLE	DATE	FILE NAME	NOTES
Exhibit A-5A "Wells Identified as Possibly not Meeting Minimum Requirements for Offsetting UIC Project"	Oct. 14, 2008	34000157 data	Received from DOGGR via PRA
Monitoring Program for Water Disposal Well Pulas 6 Arroyo Grante Field	Feb. 26, 2009	02806003 #1 of 2	Received from DOGGR via PRA
Monitoring Program	Sept. 14, 2008	02806003 #1 of 2	Received from DOGGR via PRA
Notice Receipt Acknowledgment	Oct. 14, 2006	02806003 #1 of 2	Received from DOGGR via PRA
Wells Dollie 8 & 10, Arroyo Grande Field	Dec. 16, 2003	02806003 #1 of 2	Received from DOGGR via PRA
Permit to Conduct Well Operations	November 2014 - 4/27/2015	02806003 #2 of 2	Received from DOGGR via PRA
Per our discussion	8/13/2014	Per our discussion	Received from DOGGR via PRA
34000045	10/29/2002 and earlier	34000045	Received from DOGGR via PRA
34000045	Nov. 1991	34000045	Received from DOGGR via PRA
Project Approval Letter 04122012 34000030	4/12/12	Project Approval Letter	Received from DOGGR via PRA
Final Submission of Minor Aquifer Exemption - Cat Canton Oil Field, Sisquoc Aquifer plus attachments contained therein	2/12/13	Final Submission of Minor Aquifer Exemption - Cat Canton Oil Field, Sisquoc Aquifer	Received from EPA via FOIA
Fw: (Notes from Call) AERA So. Belridge Aquifer Exemption	4/5/13	Fw: (Notes from Call) AERA So. Belridge Aquifer Exemption	Received from EPA via FOIA
Fw: (So. Belridge - AERA) Aquifer exemptions	7/22/11	Fw: (So. Belridge - AERA) Aquifer exemptions	Received from EPA via FOIA
Fw: CA Aquifer Exemptions 7/30/14	Fw: CA Aquifer E	xemptions	Received from EPA via FOIA

DOC TITLE	DATE	FILE NAME	NOTES
FW: Letter re: Aquifer Exemption	4/24/14	FW: Letter re: Aquifer Exemption Received from EPA via FOIA	
RE: Aquifer Exemption info from DOGGR	12/23/13	RE: Aquifer Exemption info from DOGGR	Received from EPA via FOIA
RE: Aquifer Exemptions on the website	12/5/13	RE: Aquifer Exemptions on the website	Received from EPA via FOIA
RE: Aquifer Exemptions on the website	3/20/13	RE: Aquifer Exemptions on the website	Received from EPA via FOIA
RE: National Aquifer Exemption Database - Call with Joe Tiago	1/13/14	RE: National Aquifer Exemption Database - Call with Joe Tiago	Received from EPA via FOIA
Subject: Exempted Aquifers Kern River field (Olcese) Kern bluff (Olcese)	9/14/83	19830914 memo CA Bob to Epa Lau re AE fluids gt 10,000 ppm.pdf	Received from EPA via FOIA
Re: application for exemption of Olcese zone in Sec 26 T27S R28E MDBM Gardner Lease Mt Poso Field Kern Co.	10/4/83	19831004 ltr Thomas Oil Fiedler to DOGGR Mitchell re Olcese AE appl (1).pdf	Received from EPA via FOIA
ltr DOGGR Clark to RWQCB Pfister re appl Petro-Lewis dipsosal in Olcese.pdf	11/4/83	19831104 ltr DOGGR Clark to RWQCB Pfister re appl Petro-Lewis dipsosal in Olcese.pdf	Received from EPA via FOIA
19881019 ltr DOGGR Welge to Horace re reservoir exemption request denial.pdf	10/26/88	19881019 ltr DOGGR Welge to Horace re reservoir exemption request denial.pdf	Received from EPA via FOIA
Status of a CDOG forwarded aquifer exemption request by Texaco	1/20/87	19890920 comm rec DOGGR Stettner to EPA Skamoto re Epa AE policy.pdf	Received from EPA via FOIA
Subject: Final Engineering and Geology Report Aurignac and Continental Zones - San Ardo Field	7/7/98	19980707 Aera Final Eng Geo Rpt San Ardo.pdf	Received from EPA via FOIA
UIC Exempt Aquifers for Class II Injection Wells	3/31/99	19990331 - fax EPA Zeleznik to CA NRG Comm re UIC EA in Kern, Tulare, Inyo Co.pdf	Received from EPA via FOIA
Comments - Class II Wastewater Injection Well Project and Underground Injection Aquifer Exemption - Adjacent to South Belridge Oil Field, Kern County	3/18/09	20090318 cmnts CARWQCB Gray & Wachtel to CADOGR Ellison re AE S Belridge.pdf	Received from EPA via FOIA
Underground injection control aquifer exemption for California division of oil, gas, and geothermal resources, class II	7/12/99	San Ardo Field Aquifer Exemption Approval 19990712	Received from EPA via FOIA

DOC TITLE	DATE	FILE NAME	NOTES
injection operations for Aera			
Public Water Supply Wells within 1 mile of at least one of the 41 Water Disposal (WD) Wells of Concern	2/19/15	PWS wells - batch 1	Received from SWRCB via PRA
Public Water Supply Wells within 1 mile of one of the 19 Injection Wells of concern (category 1b)	7/29/14	PWSs associated with category 1b wells	Received from SWRCB via PRA
Public Water Supply Wells within 1 mile of one of the 19 Injection Wells of concern	7/29/14	PWS associated with injection wells w no project	Received from SWRCB via PRA
Underground Injection Control Drinking Water Source Evaluation	9/15/14	swrcb_response_letter	Received from SWRCB via PRA
Table 1 DOGGR Water Board Actions	2/19/15	Table 1 DOGGR Water Board Actions	Received from SWRCB via PRA
Table 2 - 27 WDs Potentially Impacting Water Supply Wells	2/19/15	Table 2 - 27 WDs Potentially Impacting WSW	Received from SWRCB via PRA
14 WD wells Potentially Impacting Water Supply Wells - Information Orders Issued in 2014	2/19/15	Table 3 - 14 WDs potenailly imapcting water supply wells assoc prev 13267	Received from SWRCB via PRA
13267 order to Chevron	8/11/14	AUG_11_CHEVRON_13267_DSJ	Received from SWRCB via PRA
13267 order to Gray Development	8/11/14	AUG_11_GRAY_DEVELOPMENT_DSJ	Received from SWRCB via PRA
13267 order to Macpherson Operating Company	8/11/14	AUG_11_MACPHERSON_13267_DSJ	Received from SWRCB via PRA
13267 order to CMO	7/2/14	CMO, Inc. 13267 Order	Received from SWRCB via PRA
13267 order to Hathaway	7/23/14	Hathaway CVRWQCB order as served	Received from SWRCB via PRA
13267 order to Longbow	7/2/14	Longbow, LLC 13267 Order	Received from SWRCB via PRA

DOC TITLE	DATE	FILE NAME	NOTES
13267 order to Longbow	7/15/14	Longbow LLC 13267 Order Amendment-signed	Received from SWRCB via PRA
13267 order to Macpherson Operating Company	7/2/14	Macpherson Operating Company LP 13267 Order	Received from SWRCB via PRA
13267 order to Pace Diversified Corporation	7/2/14	Pace Diversified Corporation 13267 Order	Received from SWRCB via PRA
13267 order to Pace Diversified Corporation	7/15/14	PaceDiversifiedCorp13267OrderA mend-signed	Received from SWRCB via PRA
13267 order to R&R Resources	7/2/14	R&R Resources, LLC 13267 Order	Received from SWRCB via PRA
13267 order to Redbank Oil Co.	7/2/14	Redbank Oil Co 13267 Order	Received from SWRCB via PRA
13267 order to SOC Resources	7/2/14	SOC Resources Inc 13267 Order	Received from SWRCB via PRA
13267 order to Modus	3/3/15	MARCH_3_MODUS_DLW	Received from SWRCB via PRA
13267 order to WSI	3/3/15	MARCH_3_WSI_DLW	Received from SWRCB via PRA
13267 order to Chevron	3/4/15	MARCH_4_CHVRN_DLW	Received from SWRCB via PRA
13267 order to CA Resources Production Corp	3/4/15	MARCH_4_CRP_DLW(1)	Received from SWRCB via PRA
13267 order to E&B Nat Resources	3/4/15	MARCH_4_E_B_NATURAL_DL W	Received from SWRCB via PRA
13267 order to Linn Operating	3/4/15	MARCH_4_LINN_DLW	Received from SWRCB via PRA
13267 order to Badger Creek	5/15/15	2015_0515_13267_badgercreek	Received from SWRCB via PRA
13267 order to Bellaire	5/15/15	2015_0515_13267_bel laire	Received from SWRCB via PRA
13267 order to Bennett Petroleum	5/15/15	2015_0515_13267_bp	Received from SWRCB via PRA

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13267 order to Chevron	5/15/15 2015	2015_0515_13267_chev ron	Received from SWRCB via PRA
13267 order to Church & Dole	5/15/2015	2015_0515_13267_churchdole	Received from SWRCB via PRA
13267 order to CA Resources Production Corp	5/15/15 2015	2015_0515_13267_crp	Received from SWRCB via PRA
13267 order to E&B Nat Resources	5/15/15 2015	2015_0515_13267_eandb	Received from SWRCB via PRA
13267 order to Hathaway	5/15/15 2015	2015_0515_13267_hat haway	Received from SWRCB via PRA
13267 order to Kern River Holdings	5/15/15 2015	2015_0515_13267_krh	Received from SWRCB via PRA
13267 order to Longbow	5/15/2015	2015_0515_13267_longbow	Received from SWRCB via PRA
13267 order to Macpherson Oil Company	5/15/2015	2015_0515_13267_macpherson	Received from SWRCB via PRA
13267 order to Macpherson Operating Company	5/15/2015	2015_0515_13267_macpherson_lp	Received from SWRCB via PRA
13267 order to McAdams	5/15/2015	2015_0515_13267_mcadams	Received from SWRCB via PRA
13267 order to SOC Resources	5/15/2015	2015_0515_13267_soc	Received from SWRCB via PRA
13267 order to Trio	5/15/2015	2015_0515_13267_trio	Received from SWRCB via PRA
13267 order to WSI	5/15/2015	2015_0515_13267_wsi	Received from SWRCB via PRA
Technical report: injection well groundwater sampling - Kern River Oil Filed	2/6/2015	20150206_Chevron_TechnicalReport_Final	Received from SWRCB via PRA
Permit to Conduct Well Operations	11/26/2014 and 8/20/14	20150206_Chevron_TechnicalReport_Final_Appendix_B	Received from SWRCB via PRA
Response to 8/11/14 13267 order #3 - water wells	9/4/2014	20140904_Chevron_Water_Supply_Data_CvrLtr	Received from SWRCB via PRA

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Interim Report 1: Injection Well Groundwater Sampling and Source Fluids Sampling	10/2/2014	20141002_Chevron_Technical_InterimReport_1	Received from SWRCB via PRA
Interim Report 4: Well Groundwater Sampling	11/24/2014	20141124_Chevron_Technical_InterimReport_4	Received from SWRCB via PRA
Analysis of inspection water	8/20/2014	20140820_CMO_35-401_Analytical_Results_Final	Received from SWRCB via PRA
Gray Development Co Injection Well Gray WD-1	8/18/2014	20140818_Gray_Work_Plan_Letter	Received from SWRCB via PRA
Gray Development Co Injection Well Gray WD-1	9/4/2014	20140904_Gray_TechnicalReport_WaterSupply_Well	Received from SWRCB via PRA
Gray Development Co Injection Well Gray WD-1	9/4/2014	20140904_Gray_TechnicalReport_WaterSupply_Well	Received from SWRCB via PRA
Exhibit A		Hathaway_ExhibitA_Analytical_Results	Received from SWRCB via PRA
Water sampling report	8/22/2014	20140822_Longbow_TechnicalReport_Amended_noRadNuc	Received from SWRCB via PRA
Groundwater sampling work plan 8/25/2014		20140827_MacOil_Bishop6_Work_Plan	Received from SWRCB via PRA
Underground injection well Bishop 6 informational report	9/11/2014	20140911_MacOil_Malta3_TechnicalReport	Received from SWRCB via PRA
Macpherson Operating Company Formation Water Sampling Report	10/13/2014	20141013_MacOil_Bishop6_TechnicalReport_Final	Received from SWRCB via PRA
Response to CVRWQCB 13267 Order 7/2/14	8/1/2014	20140801_R&R_TechnicalReport	Received from SWRCB via PRA
Analytical results for groundwater samples from domestic well at 12020 Pioneer Drive Extension, Bakersfield	8/15/2014	20140815_RWQCB_DomWell_Analytical_Results	Received from SWRCB via PRA
Response to CA Water Code Section 13267 7/2/14	8/25/2014	20140825_R&R_TechnicalReport_Addendum	Received from SWRCB via PRA
Analytical Results for groundwater samples from domestic well at 8327 Redbank Road, Bakersfield	8/15/2014	20140815_RWQCB_DomWell_2_Analytical_Results	Received from SWRCB via PRA
Analytical Results for groundwater samples from Wilson Road water company supply well on East	8/15/2014	20140815_RWQCB_WilsonRd_Analytical_Results	Received from SWRCB via PRA

DOC TITLE	DATE	FILE NAME	NOTES
Wilson Road, Bakersfield			
Analytical Results for groundwater samples from East Niles Community Services District water supply well Bakersfield	8/18/2014	20140818_RWQCB_EastNiles_Analytical_Results	Received from SWRCB via PRA
Analytical Results for groundwater samples from San Joaquin Estate mutual water supply well, Bakersfield	8/18/2014	20140818_RWQCB_SanJoaquin_Analytical_Results	Received from SWRCB via PRA
Analytical Results for groundwater samples from San Joaquin Estate mutual water supply well, Bakersfield	8/18/2014	20140818_RWQCB_SanJoaquin_Analytical_Results	Received from SWRCB via PRA
Water Sampling Report	8/29/2014	20140829_Redbank_TechnicalReport_Addendum	Received from SWRCB via PRA
Technical Report, Groundwater Sampling - injection well	5/21/2015	20150521_Chevron_TechReport	Received from SWRCB via PRA
Response to Emergency Order 1066	4/13/2015	20150413_Modus_Email_ResponseTo_DOGGR	Received from SWRCB via PRA
Re: Emergency order to cease injection operations immediately and provide information, 1066	4/13/2015	20150413_Modus_ResponseTo_DOGGR	Received from SWRCB via PRA

III. Miscellaneous

DOC TITLE	DATE	FILE NAME	NOTES
Transcript of Video Recording SWRC Board Workshop	4/8/15	State Water Board Workshop Transcript	
Transcript of Video Recording, Joint Hearing Senate Natural Resources and Water Committee and Senate Environmental Quality Committee, "Ensuring Groundwater Protection..."	3/10/15	Transcript of Senate Oversight Hearing on UIC Program	
Benzene in Water Produced from Kern County Oil Fields Containing Fresh Water	1993	Benzene in Water Kern County Oil Fields 1993	
CBD Comments on Emergency Regulations	4/15/2015	CBD and Earthjustice Comment	

Subject: Aquifer Exemption Emergency Rulemaking	4/15/2015	Sierra Club Comments on Emergency Regulations	
Joint CBD/Sierra Club Comments on Permanent Regulations plus attachments	7/13/15	Sierra Club Permanent Regs Comment (folder)	